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November 13, 2001

Gloria Blue, Executive Secretary
TPSC, Office of the USTR
600 17th Street, NW
Washington, DC 20508

Re: Product Exclusions, Certain Steel Products, USITC Inv. No. TA-201-73

Dear Secretary Blue:

On behalf of Ascometal Co. and in accordance with USTR's request for comment, 66 FR 54321 (October 26, 2001), we submit a request to exclude certain bearing quality alloy bar used in rings and races from import relief under section 203. We attach the same information contained in this letter in the form of an Exclusion Request Data Sheet as used by the USITC.

(a) Designation under a recognized standard or certification
HTS 7228.30.2000

(b) Description based on physical characteristics
Special grade steel dedicated to ring and race automotive antifriction bearing applications under strict specifications for cleanliness, surface defects, and in-depth defects.

(c) Basis for exclusion
The domestic industry does not produce steel alloy bar used in antifriction bearing systems in sufficient quantities to meet US customers' requirements.

P-DSL005

(d) Names of domestic and foreign producers

Timken and Ascometal. Timken is the only domestic producer of bearing grade bar, but is unable to manufacture wire rod. Except for Timken, all bearing manufacturers rely on European and Japanese imports.

(e) Total US consumption 1996-2000 (in short tons) (estimate)

1996	1997	1998	1999	2000
NOT AVAILABLE				

(We are unable to provide realistic demand projections because Ascometal's sales of this product are dependent on customer requirements.)

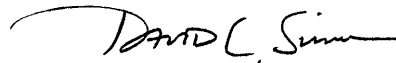
(f) Total US production 1996-2000 (in short tons) (estimate)

1996	1997	1998	1999	2000
NOT AVAILABLE				

(g) Identity of US produced substitute products

There are no substitutes for this product.

Respectfully submitted,



David L. Simon



UNITED STATES INTERNATIONAL TRADE
COMMISSION



STEEL, Inv. No. TA-201-73
EXCLUSION REQUEST DATA SHEET

If you are interested in requesting that specific products be excluded from this investigation, please supply the following information to the Commission by no later than Wednesday, October 17, 2001. Complete a separate exclusion request form for every product you are requesting an exclusion for. You may fax the completed form to the attention of D.J. Na at 202-205-3205.

Firm: ASCOMETAL	Fax #: 33 1 41 25 96 88
Contact person: Maxime LAZARD	Email address: mlazard@ascometal.lucchini.com
Have you submitted an exclusion request in a previous letter? NO	

HTS number(s) covering the product requested for exclusion:
HTSUS 7228 30 2000 in Hot Rolled bars and light shapes – Carbon & Alloy Long products.

Detailed description of product requested for exclusion (please do not only refer to the model number):

The products covered by this HTSUS number are special quality grades of steel dedicated to the end application of Rings and Races in contact with the rolling elements (eg : balls, rollers, needles) of anti friction bearings systems used in the Automotive and other industries.

These grades are offered in a wide area of dimensions (sections) with usually extremely demanding specifications covering Cleanliness, surface defects, in-depth defects, etc... US-based bearing manufacturers (like their foreign counterparts) often have their own specifications.

!!! Volumes hereunder cover sales on HTS US 7228 30 2000 according to available statistics. US based manufacturers' domestic deliveries are unknown to us.

Quantity (in short tons) of U.S. imports of product requested for exclusion:

Source	1996	1997	1998	1999	2000	Jan.-June 2000	Jan.-June 2001
Canada	56	81	7	22	6		
Mexico	0	0	0	0	0		
All others	6 354	12 955	13 902	21 707	20 254		
Total	6 410	13 036	13 909	21 729	20 254		

Value (landed, duty-paid in U.S. dollars) of U.S. imports of product requested for exclusion:

Source	1996	1997	1998	1999	2000	Jan.-June 2000	Jan.-June 2001
Canada							
Mexico							
All others							
Total							

Estimated quantity (in short tons) of U.S. producers' U.S. commercial shipments (not including internal consumption or exports) of product requested for exclusion (please indicate basis for estimates):

Source	1996	1997	1998	1999	2000	Jan.-June 2000	Jan.-June 2001
Total							